



Southern California Reliability

San Diego Air Pollution Control District Permitting Considerations

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Tom Weeks
Tom.weeks@sdcounty.ca.gov
(858) 586-2715

SDAPCD Permitting Considerations

Emission Offset Requirements

- Requirements contained in Rule 20.3
- Offsets required prior to issuance of Authority to Construct (ATC) for new Major Sources or Major Modifications
- Major Sources – 50 Tons Per Year Volatile Organic Compounds (VOC) or Nitrogen Oxides (NO_x)
- District requires only major source offsets (no State offset requirements)

SDAPCD Permitting Considerations

Emission Offset Availability

- Current Emission Reduction Credit (ERC) Balances
 - Oxides of Nitrogen (NO_x) – 242 Tons
 - Volatile Organic Compounds (VOC) – 279 Tons
 - Particulate Matter, 10 microns (PM₁₀) – 173 Tons
 - Oxides of Sulfur (SO_x) – 16 Tons
- Recent ERC Costs
 - NO_x – \$110,000/Ton
 - VOC – \$55,000/Ton
 - PM₁₀ - \$3,300/Ton
 - SO_x - \$4,300/Ton

SDAPCD Permitting Considerations

Alternative Generator Design Approaches

- Rule 17 specifies that Authorities to Construct (ATCs) are issued for one year unless the Air Pollution Control Officer determines that additional time is required for completion of construction
- 5 year limit on ATCs
- ATCs must be valid throughout construction process
- Permit review likely when the project is triggered

SDAPCD Permitting Considerations

Concurrent Operations

- Concurrent Operations - Emission Reduction Credits must be provided prior to issuance of ATC
- District open to allowing concurrent operation but compliance with District rules must be demonstrated

SDAPCD Permitting Considerations

Prevention of Significant Deterioration (PSD) Permitting

- PSD Permitting – SDAPCD does not currently have PSD delegation
- PSD delegation agreement an option
- District Board action may be required